

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

Jonathan Gladney
Plaintiff

2019 FEB -7 A 11:18

V.

DEBRA D. HASKETT, CLK
US DISTRICT COURT
NORTHERN DIVISION

Civil Action NO 2:18-CV-442-WKW

WILLIE Burks, ET.AL
Defendants.

REPLY TO SPECIAL REPORT -

Comes now Jonathan Gladney Prose in the above style and cause,
as ordered by this Court on or before 1/9/19.

ABUGUMENT

The PLAINTIFF contends because he was denied Medical Treatment at 10:20 AM on 8/30/16 (AM) at 4:35 PM EVEN to include MENTAL HEALTH Treatment for A EVENT MEANING PHYSICAL ALTERCATION which led to the Death of inmate DAVEION WILLIAMS Gladney the PLAINTIFF contends on 5/10/2006 HE WAS SENTENCE TO LIFE with the A.D.O.C. AND SENTENCE TO S.A.P. DUAL DIAGNOSIS PROGRAM AND STRESS & ANGER MANG PROGRAM For MANSLAUGHTER CONVICTION CASE NO: 2005000197 Gladney contend HE WAS LEGALLY SENTENCE with Substance Abuse AND MENTAL Health (AN) ANGER STRESS Problems (OR) disorder's the PLAINTIFF contends when the STATE takes A PERSON into its custody and holds him there AGAINST his will the Constitution imposes upon it a corresponding duty to assume some responsibility for his safety and general well being. Gladney contends at 10:20 AM on 8/30/16 WAS AWARE OF the PLAINTIFF MENTAL Health disorders the PLAINTIFF contends at 4:35 PM the Correctional Defendants WAS AWARE OF His MENTAL health disorder on 8/30/16 AND DENIED the PLAINTIFF OF Medical AN MENTAL health Treatment while acting under the color of State Law. Gladney contends His Alabama Department of Corrections Inmate Summary is before the Court stating the above. The PLAINTIFF contends HE WAS deprived medical Care AN reasonable SAFETY (See) Civ. Act 2:17-CV-0021-ECM Gladney v HEADLEY Doc. 12 & 23 Gladney contends the Correctional Defendants knew He Had been Sentence with A MENTAL Health disorder AND Substance Abuse ANGER & STRESS MANG disorder AND by placing the PLAINTIFF back into A Heated Environment Creating A WONTON OMISSION Citing - Whitley v. Albers 475 U.S. 312, 1986. Gladney contends For Hours He suffered from racing thoughts ANGER, rage depression and distress the PLAINTIFF contend at 4:36 PM on 8/30/16 He was Diagnosed by Lieutenant Burks as NORMAL After the Death of inmate WILLIAMS Gladney contend Exhibit G clearly rebutt ALL remarks made by Lt. Burks, ET.AL Defendants

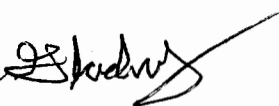
The PLAINTIFF contends that the Correctional Defendants transgressed the substantive limits on state action set by the Eighth Amendment and the Due Process Clause

By Denying Gladney the right to medical Treatment (and) Mental health Treatment at the time of EACH incident Gladney contends HE being A WARD OF THE STATE has the right to Medical Care even to include Mental health Treatment after being assaulted twice (2) Gladney contend this Constitutional right clearly ~~was~~ had been infringed Failure to provide or even to Refer the PLAINTIFF to Medical (and) Mental health when Correctional Defendants (Knew) Gladney was sentenced with such conditions manifest conscious or callous indifference to A Prisoner's rights.

Gladney seeks to be Compensated.

I Jonathan Gladney Certify that the Foregoing is True AND Correct.

Respectfully Submitted.

Pro'se Jonathan 
Jonathan Gladney 228295
100 WARRIOR LANE
Bessemer Alabama 35023

Date 2-4-19

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

Jonathon Gladney #228295
PLAINTIFF

2018 FEB -7 A 11:18

V.

WILLIE BURKS, ET AL
DEFENDANTS

Civil Action NO:
2:18-CV-442-WKW

Affidavit

MY NAME IS JONATHON GLADNEY I AM CURRENTLY BEING HOUSE'D AT
WILLIAM E. DONALDSON CORRECTIONAL FACILITY 100 WARRIOR LANE BESSEMER
ALABAMA 35023. I AM OVER TWENTY-ONE YEARS OF AGE

ON AUGUST 30, 2016 I, INMATE JONATHON GLADNEY 228295 WAS INVOLVED IN TWO
SEPARATE INCIDENTS (BOTH) BEING PHYSICAL ALTERCATION AND RECEIVED SEVERAL
INJURIES (SEE) EXHIBIT A PAGE 9 OF 13 CORIZON NURSING ENCOUNTER TOOL OF CIV.
ACT 2:18-CV-442-WKW GLADNEY V BURKS, ET AL EVEN TO INCLUDE MENTAL
HEALTH INJURIES (SEE) DOC. 72 • (SEE) EXHIBIT G PAGE 60 OF 91 (AN) PAGE
61 OF 91 (AN) PAGE 62 OF 91 MEDICATION PRESCRIBED AND DIAGNOSIS OF GLADNEY
FOLLOWING THE INCIDENTS OF 8/30/16 AS EVIDENCE

I JONATHON GLADNEY DO HEREBY UNDER THE PENALTY OF PERJURY SWEAR THAT THE FOREGOING
IS TRUE AND CORRECT.

Prose Jonathon Gladney
Jonathon Gladney 228295
100 WARRIOR LANE
BESSEMER ALABAMA 35023

Date 2-4-19

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CERTIFICATE OF SERVICE

I Jonathon Gladney do hereby certify that a true and correct copy of the foregoing has been furnished by U.S. MAIL SERVICE on this 2-4-19 to the OFFICE OF THE CLERK UNITED STATES DISTRICT COURT ONE Church Street Suite B-110 Montgomery ALA 36104

Pro'se Jonathon Gladney
Jonathon Gladney 228295
100 WARRIOR LANE
Bessemer Alabama 35023

Date 2-4-19

Respectfully Submitted,

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CERTIFICATE OF SERVICE

I Jonathan Gladney do hereby certify that a true and correct copy of the foregoing has been furnished by U.S. MAIL SERVICE ON this 2-4-19 to the Correctional Defendant Office of The ATTORNEY GENERAL 501 WASHINGTON AVENUE P.O. Box 300152 MONTGOMERY ALABAMA 36130, (AND) Stephen L. Rogers Attorney for Medical Provider & Janice Reeves

655 GALLATIN STREET
HUNTSVILLE ALABAMA 35801

JONATHAN GLADNEY 228295
100# WARRIOR LANE
BESSEMER AL 35023

"This correspondence is forwarded
from an Alabama State Prison. The contents
have not been evaluated; and the Alabama
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OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
ONE Church Street Suite 1510
Montgomery, AL 36104

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